

EXHIBIT A

PATRICK E. STOCKALPER, SBN 156954
MOLSHREE GUPTA, SBN 275101
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841 Apollo Street, Suite 100
El Segundo, California 90245
Telephone (424) 217-3026
Facsimile (424) 367-0400
pstockalper@kmslegal.com
mgupta@kmslegal.com

Attorneys for Defendants,
COUNTY OF LOS ANGELES and DEPUTY TRAVIS KELLY
(Defendants is exempt from filing fees pursuant to Government Code § 6103)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSHUA ASSIFF,

Plaintiffs,

v.

COUNTY OF LOS ANGELES;
SHERIFF DEPUTY BADGE
NUMBER 404532; And DOES 1
through 10,

Defendants.

Case No.: 2:22-cv-05367 RGK(MAAx)

**OBJECTION TO THE NOTICE OF
TAKING DEPOSITION OF
DEFENDANT COUNTY OF LOS
ANGELES**

Action Filed: August 3, 2022
Pretrial Conference: July 10, 2023
Trial Date: July 25, 2023

Assigned to:
Hon. R. Gary Klausner, District Judge
Courtroom 850

All Discovery Matters Referred to:
Hon. Maria A. Audero, District Judge

TO ALL PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to California Code of Civil Procedure § 2025.410, Defendants, COUNTY OF LOS ANGELES and DEPUTY TRAVIS KELLY hereby object to the Notice of Taking Deposition of COUNTY OF LOS ANGELES, set for April 26, 2023 at 10:00 a.m. served by Claimants via electronic mail on March 31,

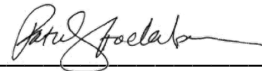
2023, on defense counsel. The objection to the deposition is made on the following grounds:

1. Defendants object to the date, time, and location of the deposition on the grounds that it was unilaterally selected by counsel for Plaintiff without first verifying the availability of defense counsel and the witness. As neither the deponent nor counsel for Defendants are available to proceed on April 25, 2023, the deposition will need to be rescheduled for a date and time convenient to all counsel and to the deponent. Plaintiff is requested to contact counsel for Defendants to coordinate a mutually convenient date, time and location for the deposition. Defendants and counsel are not available as noticed.

Dated: April 18, 2023

KJAR, MCKENNA & STOCKALPER, LLP

By:



PATRICK E. STOCKALPER

MOLSHREE GUPTA

Attorneys for Defendants,

COUNTY OF LOS ANGELES and DEPUTY
TRAVIS KELLY

CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 841 Apollo Street, Suite 100, El Segundo, California 90245.

On April 18, 2023, I served the foregoing document described as **OBJECTION TO THE NOTICE OF TAKING DEPOSITION OF DEFENDANT COUNTY OF LOS ANGELES** on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

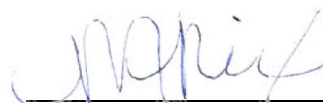
By Mail I caused such envelope(s) to be deposited in the mail at El Segundo, California. The envelope was mailed with postage thereon fully prepaid and addressed to the parties listed on the Service List. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

XX **By Email** Based upon a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in the Service List. My email address is mnixon@kmslegal.com.

By Personal Service I caused such document to be Personally Served on the parties listed in the Service List.

XX **State** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 18, 2023, at El Segundo, California.



Maria Nixon

SERVICE LIST

Assiff, Joshua vs. County of Los Angeles, et al.

Central District- Case No.: 2:22-cv-05367 RGK(MAAX)

Thomas M. Ferlauto, Esq. Law Office of Thomas M. Ferlauto, APC 25201 Paseo de Alicia, Ste. 270 Laguna Hills, CA 92653 EM: tmf@lawofficetmf.com	Attorney for Plaintiff, JOSHUA ASSIFF
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Attorneys for Defendants,
COUNTY OF LOS ANGELES and DEPUTY TRAVIS KELLY
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSHUA ASSIFF,

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v.

COUNTY OF LOS ANGELES;
SHERIFF DEPUTY BADGE
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TAKING DEPOSITION OF
DEFENDANT TRAVIS KELLY**

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Assigned to:
Hon. R. Gary Klausner, District Judge
Courtroom 850

All Discovery Matters Referred to:
Hon. Maria A. Audero, District Judge

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PLEASE TAKE NOTICE that pursuant to California Code of Civil Procedure § 2025.410, Defendants, COUNTY OF LOS ANGELES and DEPUTY TRAVIS KELLY hereby object to the Notice of Taking Deposition of TRAVIS KELLY, set for April 25, 2023 at 10:00 a.m. served by Claimants via electronic mail on March 31, 2023, on defense counsel. The objection to the deposition is made on the following grounds:

1 1. Defendants object to the date, time, and location of the deposition on the
2 grounds that it was unilaterally selected by counsel for Plaintiff without first verifying
3 the availability of defense counsel and the witness. As neither the deponent nor counsel
4 for Defendants are available to proceed on April 25, 2023, the deposition will need to be
5 rescheduled for a date and time convenient to all counsel and to the deponent. Plaintiff is
6 requested to contact counsel for Defendants to coordinate a mutually convenient date,
7 time and location for the deposition. Defendants and counsel are not available as noticed.

8
9
10 Dated: April 18, 2023

KJAR, MCKENNA & STOCKALPER, LLP

11
12 By: 

13 PATRICK E. STOCKALPER

14 MOLSHREE GUPTA

15 Attorneys for Defendants,

16 COUNTY OF LOS ANGELES and DEPUTY

17 TRAVIS KELLY
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CERTIFICATE OF SERVICE

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On April 18, 2023, I served the foregoing document described as **OBJECTION TO THE NOTICE OF TAKING DEPOSITION OF DEFENDANT TRAVIS KELLY** on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

By Mail I caused such envelope(s) to be deposited in the mail at El Segundo, California. The envelope was mailed with postage thereon fully prepaid and addressed to the parties listed on the Service List. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

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Thomas M. Ferlauto, Esq. Law Office of Thomas M. Ferlauto, APC 25201 Paseo de Alicia, Ste. 270 Laguna Hills, CA 92653 EM: tmf@lawofficetmf.com	Attorney for Plaintiff, JOSHUA ASSIFF
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